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July 6, 2020

Via US Mail and E-mail: sscantlebury@azwater.gov

Director Tom Buschatzke
Arizona Department of Water Resources
Attn: Sharon Scantlebury, Docket Supervisor
P.O. Box 36020
Phoenix, Arizona 85067-6020

RE: Mohave County Rebuttal to Town of Queen Creek and GSC Farm, LLC Applicant's Response to Public Comments filed on May 7, 2020

Dear Director Buschatzke:

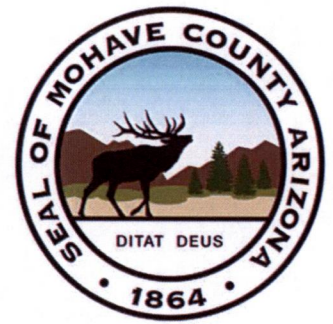
The Department of Water Resources ("Department"), by communication dated February 10, 2020 afforded GSC Farm, LLC and the Town of Queen Creek ("Applicants") 90 days under the Transfer Policy for the limited purpose "to review the public comments in detail and to attempt to address any concern of negative impact from the proposed transfer action that have been expressed." The Applicants were advised that they must inform the Department of their attempts to resolve and/or respond to any claims of negative impacts from the proposed transfer action.

The Applicants are well aware of the elected officials representing Mohave County that they should have contacted. This Board's members have made their positions quite well known during the Department's public process. Supervisor Gary Watson testified at the Phoenix public meeting; Then-Chairman Hildy Angius and Supervisor Ron Gould testified at the Bullhead City meeting; and now Chairman Jean Bishop testified at both the Bullhead City and Yuma public meetings. Please see the enclosed "Attachment A" compiling the testimony of Mohave County leaders who participated in the Department's public process.

Instead of using their time to meet with and discuss the concerns of these elected officials opposed to the transfer, the Applicants asserted a number of specious claims that now must be addressed. Each of the claims that we wish to address are highlighted below followed by our rebuttal to their claims.

Page 5, Section III.A. The Town of Queen Creek is Seeking a Sustainable Water Supply

The Town is not "seeking a Sustainable Water Supply," the Town is seeking aggressive economic growth (\$307 million by Applicants' own estimates) and state shared revenues (\$4.4 million) while compensating the out-of-state investors in GSC Farms, LLC with a windfall of \$20 million for selling water they do not own but is owned by the citizens of the United States. Such windfalls cannot be the policy of the State of Arizona and surely that is not the policy of the Department of Water Resources that long ago reserved this water for the River Communities in Western Arizona.



Pages 9-12, Section IV, The 15 Comments in Support of the Transfer

The Applicants did not engage in any negotiations with any of the over 850 commenters opposed to the transfer during the 90 day negotiation period, and the Applicants cover letter explains why on page 2, paragraph 1: "But none of these comments are subject to mitigation or resolution without destroying the fundamental benefits of this proposed transfer." Of course, because the Applicants want to sell and buy the water and transfer it to Central Arizona.

Pages 13 to 16, Section V.1, The 164,652 acre-feet of Arizona Co-Equal 4th Priority water was NOT "Reserved" for on-river use in the 1988 Central Arizona Project Master Contract

The Applicants misconstrue or misstate the reservation. The master contract does not "reserve" the water. The State of Arizona reserved the water for the River Communities over a period of years out of its entire 2.8 million acre-feet. The master contract simply documents this reservation. GSC Farm, LLC, a Delaware limited liability company, does not own the 4th Priority Water they seek to sell and transfer to the Town. The State of Arizona made this reservation in conjunction with the Bureau of Reclamation back in the 1970s.

Pages 16 to 19, Section VI, The GSC Contract Expressly Contemplates Transfers

The Secretary of the Interior is indeed the "Water Master" of the Colorado River under the Boulder Canyon Project Act, but the Secretary is loath to transfer the point of use of water inside a state contrary to the wishes of the State and without the consent of nearby Colorado River users. The Applicants apparently seek to transfer this water 200 miles over the nearly unanimous opposition of Arizona's Colorado Communities.

Pages 22 to 25, Section VIII, Municipal Water Providers in Mohave, La Paz and Yuma Counties Already Have Substantial Allocations of Water for Future Municipal Growth

The impact on the River Counties will be the subject of a detailed inquiry under the National Environmental Policy Act should any request by the Applicants ever be filed with the Bureau of Reclamation and the Secretary of the Interior. This inquiry will demonstrate the full impact on the River Communities. There is no doubt that the River Counties will seek a full Environmental Impact Statement under NEPA to assess all the adverse environmental, social and economic consequences of the loss of 2,083.1 acre-feet of water from the River Communities to the Town of Queen Creek - a Town over 200 miles away from the River.

Sincerely,

MOHAVE COUNTY BOARD OF SUPERVISORS



Jean Bishop, Chairman

xc The Honorable Doug Ducey, Governor of Arizona
The Honorable Martha McSally, United States Senate
The Honorable Kyrsten Sinema, Senator, United States Senate
The Honorable Paul Gosar, United States Congress
The Honorable Raul Grijalva, United States Congress
The Honorable Andy Biggs, United States Congress
Secretary David Bernhardt, Department of the Interior
Commissioner Brenda Burman, Bureau of Reclamation
Regional Director Terry Fulp, Bureau of Reclamation
Mohave County Board of Supervisors

ATTACHMENT A

**Mohave County Officials, Leaders and Individuals
In Opposition to the
GSC Farm LLC/Town of Queen Creek
Colorado River Water Transfer Application**

Mohave County Officials, Leaders and Individuals in opposition to the GSC Farm LLC/Town of Queen Creek Colorado River water transfer application.

Mohave County Board of Supervisors

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Mohave County Officials, Leaders and Individuals
In Opposition to the
GSC Farm LLC/Town of Queen Creek
Colorado River water transfer application

Name	Position	Speaker	Written Comments
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Mohave County Board of Supervisors

Gary Watson	Supervisor District 1	Phoenix 11/19/20 Parker 11/20/20	#02 #05
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Mohave County opposes a transfer of 4th priority Colorado River water. It's already been allocated to communities along the river for use up and down, north and south on the river corridor. It is the transfer of the water away from this mainstream, east or west of the river, that Mohave County must oppose by all means and also as long as it takes. (Phoenix)

The only thing I have for you this morning or this afternoon is one is a resolution from the County Supervisors Association. That association represents every county in Arizona, and the other resolution I have is from Mohave County, which unanimously adopted a resolution that will be opposing the permanent transfer of 4th priority Colorado River water and transferring it to the -- Maricopa, Pinal and Pima, and with that I'd like to thank you very much. (Parker)

. . . the water Greenstone seeks to transfer is the economic lifeblood of our River Communities. It is our very future and Greenstone seeks to wheel it to far wealthier communities for their own benefit. Our citizens demand that we protect their interests and oppose this action by all means. This lost economic opportunity can never be recovered. (#2)

GSC does not have Arizona surface water rights that can be severed and transferred as property by ADWR under Arizona Law. This water under contract is controlled by federal law and BOR and, since 2005, it has been clear law in Arizona that no one, including individual farmers, owns or has vested rights in 4th Priority Colorado River Water. In *Maricopa-Stanfield v. Robertson*, 123 P.3d 1122, 211 Ariz. 485 (Ariz., 2005) the Arizona Supreme Court ruled against individual agricultural landowners that asserted that they had "vested rights" to Colorado River water in a dispute with their irrigation district that involved CAP 4th Priority Colorado River Water. The Arizona Supreme Court ruled against the farmers in part because the Boulder Canyon Project Act (BCPA) in Section 5 states "that 'no person shall have or be entitled to have the use' of such water except by a contract with the Secretary." *Robertson* at 11. GSC's contract dictates where and for what the water can be used. If GSC no longer needs the water, BOR, not GSC, decides who get the water next. (#5)

Hildy Angius	Supervisor District 2 Board Chairman	Bullhead City 11/20/20	#06
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As a matter of public policy, Mohave County opposes the transfer of 4th priority Colorado River water that has already been allocated to communities along the river away from the main stem of the river for use in Central Arizona. It is the transfer of this water away from the main stem of the river that Mohave County must oppose by all means and all forms and for as long as it takes. The damage this transfer will cause for the people of my district and inevitably all of rural Arizona if it goes through, is the wealth produced by this water through economic development will be generated in Central Arizona. That water is the economic life blood of the river communities and once it is gone, it will never return. (Bullhead City)

You may ask the value of this water to our River Communities? The Town of Queen Creek has answered that question in their Press Release of August 1, 2019 in which they value this water at \$307.7 million of annual economic impact in Central Arizona. That is wealth that will eventually, not tomorrow, be generated right here in the River Communities- it cannot be transferred away from the River. This \$307.7 million dollars of annual wealth is the value of this water and it cannot leave the River Communities. (#6)

Name	Position	Speaker	Written Comments
Jean Bishop	Supervisor District 4	Bullhead City 11/20/20 Yuma 11/21/20	#07 #16

Some of the reasons for this opposition, first off, Mohave County opposes diversion of fourth priority water from the Colorado main stream to Central Arizona because this water was long ago reserved for use by the river communities. Again, refer to my written comments. Arizona specifically reserved 164-plus (sic) acre feet -- that's 9.89 percent of Arizona's fourth priority river entitlements -- for on-river entitlements to Arizona's Colorado River communities. To be clear, these Central Arizona communities were allocated over 90 percent of the fourth priority water made available to Arizona. This department, speaking for all of Arizona, has taken the position that "It is the Department's unequivocal position that this water be reserved for future M&I use along the river." This reservation of water is also recognized in the master repayment contract between the Department of Interior and CAWCD and its amendments. . . . Second, there exists today other sources of water that are available to Queen Creek to provide water from Arizona's urban growth. Some examples are: The Harquahala Basin offers water that can be obtained and transferred today to Queen Creek; and, also, CAGR is available today for development in Queen Creek; and, also, the Gila River Indian Community water is available to any entities to lease that water. And, third, as you've heard from my colleagues, the water Greenstone seeks to transfer is the economic lifeblood of our river communities. It's our future, and Greenstone seeks to wheel it to far wealthier communities their own benefit. Our citizens demand that we protect their interest and oppose this action by all means. (Yuma)

Also, GSC does not have Arizona surface water rights that can be severed and transferred as property by ADWR under Arizona Law. This water under contract is controlled by federal law and BOR and, since 2005, it has been clear law in Arizona that no one, including individual farmers, owns or has vested rights in 4th Priority Colorado River Water. (#7, #16)

Ron Gould	Supervisor District 5	Bullhead City 11/20/20
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I don't know how many of you ever watched the show Cadillac Desert. Well, Cadillac Desert is about the City of Los Angeles taking the water from the Owens Valley in California and how it dried up farming and dried up their economy in that area. So I ask you please don't transfer this water to the Phoenix area and make Mohave County Arizona's version of the Owens River Valley. (Bullhead City)

Mohave County Board of Supervisors

#314

First, the water Greenstone purports to transfer to Central Arizona will never return to develop La Paz County and it represents the economic lifeblood of La Paz County and the River Communities. And yet Central Arizona has already received 10 times the amount of Colorado River water the River Communities did in the 1970s. Except for that small reservation for the River Communities of 164,652 acre-feet of 4th Priority Colorado River water, Central Arizona received all of Arizona's remaining Colorado River entitlement- about 1.6 million acre-feet. Moving the Cibola water defeats the purpose for which it was reserved: to provide water for future municipal and industrial users along the River -just as DWR confirmed in its famous 1990 letter that we discuss below.

Second, somehow Central Arizona citizens believe that they are more deserving of this water, or somehow "better than" the River Community citizens. There can be no better proof that the Town believes their citizens are "better than" the River Community citizens than their letter comparing the economic gain they seek, and what the Town seeks to "leave behind" for La Paz County.

In Greenstone's joint undated letter with GSF to Mr. Craig Sullivan, Executive Director of the County Supervisors Association (CSA), the applicants explain their motivation on page 4: Annual State Shared Tax Revenues from this water to the three Central Arizona Counties will be \$4,456,000 and La Paz County will be left with: \$12,000 per year.

That result cannot be the policy of the State of Arizona and surely that is not the policy of the Department of Water Resources that long ago reserved water for the River Communities in Western Arizona. (#314 cover letter)

Name	Position	Speaker	Written Comments
Patrick Cunningham	HighGround Public Affairs, Mohave County and Mohave County Water Authority	Bullhead City (11/20/20), Parker (11/20/20)	

First of all, we think that the Harquahala Basin is a transfer basin. The legislature made it a transfer basin way back in 1991. It could have million acre-feet. It could have 40 million acre-feet, depending on who you believe, and it is a place where a political subdivision like Queen Creek could buy land or buy credits, put the water in the canal and move that water on a permanent basis to their -- to their town. (Bullhead City)

And then there are all of Wade's districts. Wade's districts went out the door with Wade when he left today, but let me just say on their behalf if we allow this sale, then those districts are next in line. And the highest bidder is not in Queen Creek. It's in Los Angeles. Water on the river can go up and down, north and south. Yes, Mohave did transfer water up. Ehrenberg did transfer water up, and we salute those transfers using water up and down the river, but the water can never go east and west. And if you open this market, Queen Creek will not be the winning bidder. Los Angeles will be the winning bidder. They have 19 million rape (sic) payers. And judging by the Lakers, they know how to write checks. We oppose this. (Parker)

Mohave County Water Authority

Mark Clark	Chairman Mohave County Water Authority Councilman, Bullhead City	Bullhead City 11/20/20 Parker 11/20/20	#09
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Yesterday the Bullhead City Council passed Resolution 2019R-49 opposing this transfer. And on December 17th, 2018, the Mohave County Water Authority passed a similar resolution opposing this transfer. And, in fact, in -- next month the Mohave County Water Authority will take this up again and pass another resolution, a little stronger resolution in opposition to this transfer. I want to make our policy position perfectly clear. We oppose the proposed permanent sale and transfer of any 4th priority water off the river to Central Arizona. (Bullhead City)

I am in opposition to this. Mohave County Water Authority is in opposition to this, and the City of Bullhead City is in opposition to this. . . . A farmer back here mentioned earlier that Mohave County transferred water up from Cibola a few years ago. We did. Those kinds of transfers were great for the river communities because we share, but that water needs to be used on the river. There are entities on the river that need additional water supplies. (Parker)

The transfer will negatively impact other Fourth Priority mainstem entitlement holders because there is no other water source available for future Municipal, Industrial and Agricultural uses along the Colorado River. I repeat, mainstem users have NO alternative sources of water. There are NO in state streams, there is NO groundwater, there is only the small amount of 4th priority water for the river communities for our future economic growth. This lost economic opportunity can never be recovered. (#9)

Name	Position	Speaker	Written Comments
Jamie Kelley	General Counsel Mohave County Water Authority	Phoenix 11/19/20 Bullhead City 11/20/20 Parker 11/20/20	#310

As a resident of a on-river community, I believe this proposed transfer is a threat to the life of rural on-river communities, but I think it's important to note that 4th priority Colorado River water is not the same as other surface water in Arizona. Colorado River water is not subject to private ownership like other surface water in Arizona. An entitlement contract under Section 5 for the use of 4th priority water is the contractual right to use a defined amount of water on a defined area of land. It is not a private property right. It is the right to use the water. (Phoenix)

We disagree with the proponents of the transfer that it is sound water management policy to transfer water from on-river communities, that only have 4th priority water, to Central Arizona. That prioritizes growth in Central Arizona at the expense of the river communities, and that simply is bad policy. (Bullhead City)

You can only use 4th priority water pursuant to a Section 5 contract. This water -- or the contract creates a use-of-right right, the right to use the water on a defined area of land for a defined purpose. The contract or the water is not freely fungible, as Mr. Curtis would have you believe, because there's a transfer process and the transfer is restricted by the contract. And in this particular contract at Paragraph 36, it states that GSC Farms has no right to receive any benefit from the water other than the right to use the water, and that's how Section 5 contracts are viewed. (Parker)

No portion of the reserved 164,625 AF of 4th priority water has transferred off the mainstem to Central Arizona. Nor should it. Public policy dictates that the reservation of the 164,625 AF be respected. Colorado River water represents the only source of dependable water supply available to river communities. Most, if not all, of the river communities are within the accounting surface of the Colorado River.

In the Request for Consultation, the stated purpose for the proposed transfer is to provide the Town of Queen Creek with a renewable source of water for future growth. No need, current or future, for the water is stated. In fact, Queen Creek expressly states it has sufficient groundwater for its future needs.

This transfer is motivated by greed, not need. The Town of Queen Creek has adequate water for its anticipated growth. The Town of Queen Creek commissioned an economic study to justify the transfer. The study projects the transfer will generate an estimated economic infusion of \$307 million in economic activity from resident spending annually in Central Arizona post transfer. In terms of tax and state shared revenue, the Town of Queen Creek, at buildout, will generate an estimated \$11,140,000 from the water while only \$12,000 is estimated to be generated in La Paz County. Those numbers do not seem to reflect a transaction beneficial to La Paz County. Growth in Central Arizona should not be permitted to occur at the expense of smaller, rural communities. To do so would likely mean the end of thriving rural Arizona river communities. (#310)

Name	Position	Speaker	Written Comments
Ryley Carlock & Applewhite	Attorneys for Mohave County Water Authority		#284 #806

It has been a fundamental cornerstone of Arizona water policy for the past half century that a balance must be maintained with regard to the allocation of Fourth Priority water entitlements between the Colorado River communities and those of Central Arizona. When the Central Arizona Project ("CAP") was authorized by state and federal legislation in the late 1960s and early 1970s, it became necessary to determine how water allocations conferred under this new system would be apportioned, as the thirst of Central Arizona's urban and agricultural interests had the potential to literally drain dry the rest of the State and return it to the status of a desert wasteland, in contravention of the very purpose and intent of the entire prior century's reclamation efforts. This is especially true in light of the well-worn Arizona adage that "water flows uphill to money," as the River communities will likely never be able to out bid their richer Central Arizona counterparts if forced into the position of competing financially for these scarce water resources.

To avert this danger, Arizona, through the Department, made it clear that a certain portion of the mainstem, or on-River, Fourth Priority Colorado River entitlements were to be specifically allocated and reserved "for municipal and industrial uses along the river. . ." . . . In fact, the Director of ADWR in 1990 advised the BoR that **"it is the Department's unequivocal position that this water is to be reserved for future M&I use along the River. It is not to be considered as supplies available for any other purpose."** . . . The 1990 Letter recognized that "[t]he increased quantity being recommended [for allocation] is part of the 164,652 recognized in the Central Arizona Project Master Repayment Contract as being available for contracting along the river." (#284)

Some of the submissions in support of the Proposed Transfer also erroneously suggest that GSC's contractual water allotment is a form of "property" that GSC is entitled to sever and sell at its discretion. These assertions are specious, as it is well-established that the rights obtained by those who contract with BoR. for allocations of 4th Priority Colorado River Water pursuant to Section 5 of the Boulder Canyon Project Act of 1928 are simply contractual rights to the use of a defined quantity of water in a specified area for a defined purpose. In fact, Section 5 of the Act states that, "... the Secretary of the Interior is hereby authorized, under such general regulations as he may prescribe, to contract for the storage of water in said reservoir and for the delivery thereof at such points on the river and on said canal as may be agreed upon, for irrigation and domestic uses . . . No **person shall have or be entitled to have the use for any purpose of the water** stored as aforesaid **except by contract** made as herein stated." 43 USC § 617d. (Emphasis added.)

The Act does not allow for the transfer of ownership to 4th Priority Colorado River Water to private users. In fact, the contracts entered into by the Secretary are subject to periodic review and cancellation if the water allocated thereunder is not being put to beneficial use; including the contract that GSC is proposing to transfer to the Town, which is subject to review every five years, and cancellation or reduction if the allotment is not being used.

The notion that GSC has a property right in the water it proposes to transfer is absolutely groundless. GSC has the right to use its water allocation in connection with its property, for so long as it complies with the terms and conditions of its contract with BoR. Its effort to arrogate that contract right into a right of ownership is contrary to law and cannot be condoned. (#806)

Name	Position	Speaker	Written Comments
Maureen George	Former General Counsel Mohave County Water Authority		#45

9) Negative Impact on Statewide Cooperative Efforts in Guiding Arizona Water Policy This proposed transfer if approved would open the door to other off River transfers. Approval of this transfer would jeopardize years of statewide cooperation on water resources issues and return Arizona to the days when its resources were at risk of being raided by out of state parties due to in state feuding. Recent decades have resulted in many successes for these statewide efforts, e.g. the Interim Surplus Guidelines, MSCP, The AWBA, and AWBA's firming programs, Arizona Shortage Sharing, and the recent DCP process. It makes no sense to put this process at risk when there are other options available which would not trigger a lengthy and significant in state conflict.

As a concerned citizen of Arizona, long time student of the Colorado River, and for the reasons listed above, I submit this letter in opposition to the proposed GSC Farm, LLC transfer to Queen Creek. (#45)

City of Kingman

Jen Miles	Mayor	Bullhead City 11/20/20
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I'm here representing the entire Council and the resolution that we passed last evening opposing the transfer of this 2,083.1 acre-feet of 4th priority water from La Paz County to the Town of Queen Creek. Kingman is a city that relies on groundwater. We do not draw from the Colorado River; however, we are here to support what we call the on-river communities because we are a region. Our region grows together and we work together as three -- three major cities in Mohave and with our partners in La Paz. I think it's been well stated that the transfer of this water sets a precedent that is unacceptable. Our economic vitality and growth depends on water. And we are growing, as I said, and we are growing in a way that is going to enrich not only our region but the whole state of Arizona. (Bullhead City)

Travis Lingenfelter	Vice-Mayor	Bullhead City 11/20/20
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This is not a precedent that should be set. And Kingman, Arizona stands with our partners in the river communities against this, and we will stand against water transfers outside of Mohave County for as long as it takes. (Bullhead City)

Lake Havasu City

Cal Sheehy	Mayor	Parker 11/20/20
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Lake Havasu City has plans for growth and development that are 5 years, 10 years, 25 years, and 50 years out, and they're outlined in our Lake Havasu City General Plan that was adopted by our voters in 2016. We need to protect our water entitlements to see if these plans come to fruition. Unlike the Central Arizona communities, Lake Havasu City and the river communities lack alternate sources of water. Water is essential for our continued economic vitality and growth. We cannot afford to be hindered because other communities need additional water resources. . . . Lake Havasu City is opposed to any permanent water transfers from the Colorado River. (Parker)

Gordon Groat	Council Member	Parker 11/20/20
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But the moral of the story is we have a huge water shortage in this area, and we deserve the right to grow. We deserve the right to prosper as our Chamber representatives have said, and we don't think it's a good idea to transfer water, so I'm in opposition. (Parker)

Name	Position	Speaker	Written Comments
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Bullhead City

Tom Brady	Mayor	Bullhead City 11/20/20	
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. . . I just want to go on the record that Bullhead City Council and the Mayor of Bullhead City are opposed to any transfer of Colorado River water.

Mark Clark	Council Member Chairman Mohave County Water Authority	Bullhead City 11/20/20 Parker 11/20/20	#09
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See Mohave County Water Authority above.

Other Leaders

Lois Wakimoto	Bullhead City Water Advisory Council Former Mohave County Supervisor	Bullhead City 11/20/20	#08
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To be clear, I oppose the proposed transfer and ask you to oppose it and recommend it against – recommend against the approval by BOR. . . . So what is good for us in this area, as we learn from Central Arizona, is that he who has water wins. We've learned that from Central Arizona. We want to win. We want to keep our water. And taking any part of the 164,000 acre-feet of 4th priority water from this area means less development, less economic growth and reduction of agriculture. (Bullhead City)

We are aware that this is the first of many transfers that some parties are planning to transfer water from Mohave, Yuma and La Paz Counties to Central Arizona. In short, I oppose all such transfers, and on behalf of my family, I must advise you that we will oppose these transfers in all forums, by all means, for as long as it takes. As I review these proposed transfers I feel like I am in the movie Chinatown – are we really replaying the Owens Valley transfers in California, where their water was taken by Los Angeles? Surely we are not sacrificing Mohave County and La Paz County citizens and taxpayers to benefit taxpayers in Central Arizona who have somehow been judged "better" than our citizens and taxpayers. Or are we? (#8)

John Pynakker	President and CEO - Bullhead Area Chamber of Commerce	Bullhead City 11/20/20	
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I represent 617 businesses and over 13,000 employees of these companies. Companies located in my area including -- include the on-river communities of Bullhead City, Laughlin, Fort Mohave, Mohave Valley and Needles, and we oppose the transfer of 4th priority water from any on-river community to Central Arizona. (Bullhead City)

Mike Bonney	Lake Havasu Area Chamber of Commerce Lake Havasu Hospitality Association	Parker 11/20/20	
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Approval of this transfer will set a dangerous precedent for future water transfers. The river communities need the water for future economic development and growth. Far more than 2,088 acre-feet of water are at risk here. The economic vitality, stability and sustainability of river communities including Lake Havasu City are at stake as -- and are determinate on maintaining the status quo. On behalf of Lake Havasu Area Chamber of Commerce, I respectfully request this agency deny the transfer, . . . (Parker)

Name	Position	Speaker	Written Comments
Dan Oehler	Attorney and Developer	Bullhead City 11/20/20	<p>The law, I believe and as I see it, is really based on precedence, and what we're looking for here with this issue is creation for bringing about a precedence, and I think it is a very negative one for our community. Our company has developed something in the range of a thousand residential lots in this area since -- since I've been here. And there are thousands more yet to develop for the benefit of our community, and we can only do that with water. So the only dependable supply of water is the Colorado River. I will tell you unlike Queen Creek, unlike Maricopa County, unlike Pima County, we have no groundwater in our community of Bullhead City or along the river. We do not have a drop as Mark Clark indicated to you. Our only supply, our only supply is the Colorado River. We need to retain that supply of river for the benefit of this community -- (Bullhead City)</p>
Larry Morse	Civil Engineer UofA Hydrology degree	Bullhead City 11/20/20	<p>It just -- it just -- it befuddles me, you know, in working this -- and we've worked with -- with groundwater issues and -- and surface water issues for -- forever around here. As a matter of fact, we're instrumental in helping Bullhead City obtain their last allocation, not -- or the last allocation from unallocated water in the United States or in the Colorado River. During my course work, one of the most influential courses that I had dealt with the Owens Valley and what -- the progression that happened with that when water was taken away from one area and wholly transmitted to another area, basically drying it up almost completely. (Bullhead City)</p>
Sandy Morse	Engineer UofA Master's degree Soil and Water Science	Bullhead City 11/20/20	<p>I oppose the transfer of water, and I want to address a couple of issues. About -- one about the low-value crops that they say that the farmers are growing these days. Mohave Valley in the past has used crop rotation and did cotton, alfalfa and then some grain crops. Well, with the advent of the purchase of all the water rights, most of the farmers in a lot of the allocated areas are no longer farming, and we find that a lot of them don't want to farm anymore, and they plant low-value crops like alfalfa, and that's all they grow out here because it's high water use. . . . I have a -- a quote here that I had found. "The price that society has to pay for food is the water and the land required to produce the crops needed for food. There is no other choice." (Bullhead City)</p>